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Admitted:

Massachusetts

New York

May 22, 2025

Honorable James M. Wicks  
U.S. Federal District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Superb Motors, Inc., et al. v. Anthony Deo, et al.*  
Case No. 2:23-cv-6188 (JW)

Your Honor:

I am writing in response to the Court's decision yesterday, May 21, 2025, regarding the delivery of thirty (30) automobiles to Anthony Deo's Hicksville New York lot by tomorrow, May 23, 2025, and hereby request amendment/modification/clarification of same, as follows:

Can the Court please amend/modify/clarify its Order regarding the delivery of thirty (30) automobiles to include the following: The vehicles need to be delivered to Anthony Deo's Hicksville New York lot by 6:00 p.m. (close of business) on Friday, May 23, 2025, along with the keys to all vehicles delivered, along with the titles to the delivered vehicles (for, *inter alia*, insurance purposes), and agreed, on site verification of the vehicles actually delivered by and between Anthony Deo and whomever is designated by the Superb Plaintiffs to deliver the vehicles to sign and agree upon a list of the delivered vehicles as prepared by Anthony Deo upon completion of the delivery (essentially, an agreed upon receipt). No prejudice can be claimed by the Superb Plaintiffs through the within letter Motion since this Court's Order has existed since May 9, 2025 (and renewed yesterday, May 21, 2025).

It is simply common dealership practice to include titles and keys to all delivered vehicles in this business, to confirm delivery with a signed writing, and for all vehicle deliveries to be conducted during business hours. I am concerned as an individual covered by the injunction at issue that mere delivery of the vehicles without the within modification/clarification is insufficient to carry out the spirit and intent of this Court's Order. Candidly, I am also concerned that the Superb Plaintiffs are going to deliver less than thirty (30) vehicles as Ordered by this Court, and I want a Court Ordered receipt signed by all upon delivery to protect me under the injunction (I believe this Court already found one vehicle missing, and the rest wrongfully encumbered). I am also mindful in making the within request that Anthony Deo found no cars on the Hartford lot when he conducted an inspection just over two months ago (March 12, 2025).

Accordingly, I hereby request that this Court modify its Orders to include the following: 1) The delivery is to be completed by 6:00 p.m. tomorrow, May 23, 2025; 2) The keys to all vehicles are to be delivered to Anthony Deo along with the vehicles; 3) The titles to all vehicles are to be delivered to Anthony Deo along with the vehicles; and 4) Anthony Deo and a designee of the Superb Plaintiffs are to cooperate and mutually sign and agree upon a receipt for the delivered vehicles. Respectfully submitted, I remain,

Very truly yours,

*Harry R. Thomasson*

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